



# United States Department of the Interior

NATIONAL PARK SERVICE

Death Valley National Park

PO Box 579

Death Valley, California 92328



April 15, 2019

Randal Porter  
Ridgecrest BLM Field Office  
300 S. Richmond Rd.  
Ridgecrest, CA 93555

Dear Mr. Porter,

Thank you for the opportunity to comment on the Panamint Valley Lithium Exploration Project, Environmental Assessment DOI-BLM-CA-D050-2019-007-EA, that would affect Death Valley National Park.

Death Valley National Park supports the "no-action" alternative.

The Panamint Valley lands are immediately adjacent to Death Valley National Park.

Some of the critical resources impacted by this mining effort include:

- Panamint Valley is a large, undeveloped valley which is readily visible from many of the iconic views for which Death Valley National Park was designated, such as the popular Telescope and Rogers Peak hikes.
- When filled with water, this shallow lake has outstandingly scenic reflections of the surrounding Panamint Mountains in Death Valley National Park.
- The area contains sensitive species including Nelson's bighorn sheep (*Ovis canadensis nelson*), bats, Panamint alligator lizard (*Elgaria panamintina*), Inyo California towhee, desert tortoise, Mojave ground squirrel, mesquite bosques, and the Panamint daisy (*Enceliopsis covillei*). Many of these species require both low elevations, such as those found in the Panamint Valley, and high elevations such as those found in the Panamint Mountains, in order to survive the extreme climactic conditions found in the Death Valley region.
- Panamint Valley's ephemeral lake has ethnographic significance to several Paiute and Shoshone Tribal groups historically associated with Death Valley.
- Death Valley National Park is recognized as an International Dark Sky Park. The National Park Service strongly discourages any mining activities that might use night lighting that would adversely impact Death Valley's dark skies.
- Dust associated with mining could adversely impact visitors, wildlife, and other natural and cultural resources at Death Valley National Park.
- The roads through Death Valley National Park, including Highway 190, are windy and not appropriate for heavy truck traffic often associated with mining.

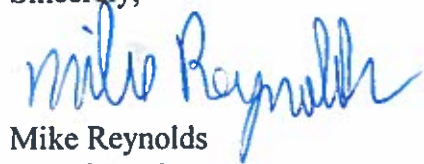
Although this phase of the project is for exploratory drilling, the ultimate objective, should a positive finding occur, is a large mining operation with significant water requirements. The water in the area is

connected to Death Valley National Park, flowing downhill out of the park to the mine sites on the valley floor. This water would normally help support life within the local ecosystem. Both the exploratory phase and the development phase of any further actions could impact the recently designated Surprise Canyon Creek, a Wild and Scenic River, which is located within 10 miles of the drill locations.

Given the significant impacts to the park's water resources, night skies, road safety, air quality, soundscapes, cultural resources, and iconic scenery, we believe it is likely that an EIS would be required as part of the operation's approval process.

Thanks again for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink that reads "Mike Reynolds". The signature is written in a cursive style with a large, prominent "M" and "R".

Mike Reynolds  
Superintendent